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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

RYAN CRAM, LAURA BAILEY, RICHARD
CAMPBELL, BARBARA GRABELL,
RENEE LEHNER, KATHERINE
MANGLONA, DEANNE MURFIN, RUTH
OLSON, CORI STEPHENS, and KATHLEEN
TRYON, as individuals and representatives of
the respective requested classes;

Plaintiff,

v.

SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 503, OREGON PUBLIC
EMPLOYEES UNION, a labor organization;
and KATY COBA, in her official capacity as
Director of the Oregon Department of
Administrative Services;

Defendants.

Case No. 6:20-cv-00544-MK

**STIPULATION RE: COMPLAINT
AND DEFENDANT SEIU LOCAL
503'S ANSWER TO COMPLAINT**

The parties to the above-captioned action, Plaintiffs Ryan Cram, *et al.*, and Defendants Service Employees International Union Local 503, Oregon Public Employees Union (“SEIU Local 503”) and Katy Coba, in her official capacity as Director of the Oregon Department of Administrative Services (“Coba”), hereby enter into the following stipulation regarding Plaintiffs’ Complaint (Dkt. No. 1) and Defendant SEIU Local 503’s Answer to the Complaint (ECF No. 15):

1. The following underlined language is hereby added to Paragraph 42 of the Complaint: “Since May 1, 2018, Olson has been a non-member of SEIU 503, yet SEIU 503 deducted \$2.75 per month from Olson’s wages for the Issues Assessment until June of 2018.”

2. The following underlined language is hereby added to the second sentence of Paragraph 60 of the Complaint: “SEIU 503 refused to cease dues deductions or the deduction of the Issues Assessment, and continued taking both out of her wages until July of 2019.”

3. Paragraph 39 of the Answer was intended to admit the allegation of Paragraph 39 of the Complaint, not those of Paragraph 29 of the Complaint. The following sentence is therefore substituted for Paragraph 39 of the Answer: “SEIU Local 503 admits the allegations of Paragraph 39.”

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The foregoing is so stipulated and agreed among the parties, by and through their undersigned counsel of record.

Dated: June 16, 2020

By: /s/Jeffrey B. Demain
Jeffrey B. Demain

Scott Kronland
Jeffrey B. Demain
Corinne Johnson
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James S. Coon
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*Attorneys for Defendant Service Employees
International Union Local 503, Oregon Public
Employees Union*

Dated: June 16, 2020

By: /s/Rebekah C. Millard
Rebekah C. Millard

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Dated: June 16, 2020

By: /s/Sadie Forzley
Sadie Forzley

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Attorneys for Katy Coba